

Kenneth R. Puhala (KP-8104)
 SCHNADER HARRISON SEGAL & LEWIS LLP
 140 Broadway, Suite 3100
 New York, New York 10005-1101
 (212) 973-8000
 (212) 972-8798 (fax)
Attorneys for Defendant

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

JOEL S. ARIIO, in his official capacity as
 Acting Insurance Commissioner of the
 Commonwealth of Pennsylvania, as statutory
 Liquidator of RELIANCE INSURANCE
 COMPANY (IN LIQUIDATION)
 1311 Strawberry Square
 Harrisburg, Pennsylvania 17120

Plaintiff,

v.

CONSTITUTION STATE SERVICES, LLC
 f/k/a CONSTITUTION STATE SERVICE
 COMPANY
 c/o Travelers Indemnity Co.
 One Tower Square 5 MN
 Hartford, Connecticut 06183

Defendant.

Civil Action No.: 07-CV-7454 (LTS)

FILED
 U.S. DISTRICT COURT
 2007 OCT 18 PM 2:16
 S.D.N.Y.

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**


PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kenneth R. Puhala, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

David M. Pelletier
Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
Telephone: 215-751-2000
Facsimile: 215-751-2205

David M. Pelletier is a member in good standing of the Bar of the State of Pennsylvania and the Bar of the State of New Jersey. There are no pending disciplinary proceedings against David M. Pelletier in any State or Federal Court.

Dated: New York, New York
October 18, 2007

SCHNADER HARRISON SEGAL &
LEWIS LLP

By: 
Kenneth R. Puhala (KP-8104)
140 Broadway, Suite 3100
New York, New York 10005
(212) 973-8000
(212) 972-8798 (fax)
Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOEL S. ARIIO, in his official capacity as
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Hartford, Connecticut 06183

Defendant.
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**DECLARATION OF KENNETH R. PUHALA IN SUPPORT
OF APPLICATION FOR ADMISSION *PRO HAC VICE*
OF DAVID M. PELLETIER**

Kenneth R. Puhala, an attorney admitted to practice before this Court, declares the following:

1. I am a partner at SCHNADER HARRISON SEGAL & LEWIS LLP, counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company.

2. I submit this Declaration in support of the application for admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York of David M. Pelletier. If admitted, Mr. Pelletier will serve as co-counsel for Defendant.

3. Mr. Pelletier is an associate of SCHNADER HARRISON SEGAL & LEWIS LLP. Mr. Pelletier maintains an office at 1600 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103-7286.

4. Mr. Pelletier was admitted to practice before the courts in the following jurisdictions on the dates set forth below:

Supreme Court of Pennsylvania, October 2003.

Supreme Court of New Jersey, January 2004.

The Certificates of Good Standing are attached hereto.

5. I have found Mr. Pelletier to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

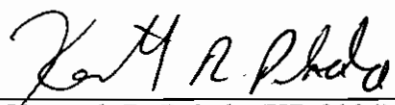
6. Accordingly, I am pleased to move for the admission of David M. Pelletier, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of David M. Pelletier, *pro hac vice*, which is attached hereto as Exhibit A.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: New York, New York
October 18, 2007

SCHNADER HARRISON SEGAL &
LEWIS LLP

By: 
Kenneth R. Puhala (KP-8104)
140 Broadway, Suite 3100
New York, New York 10005
(212) 973-8000
(212) 972-8798 (fax)
Attorneys for Defendant



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

David Matthew Pelletier, Esq.

DATE OF ADMISSION

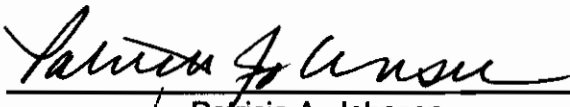
October 22, 2003

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: October 5, 2007



Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey

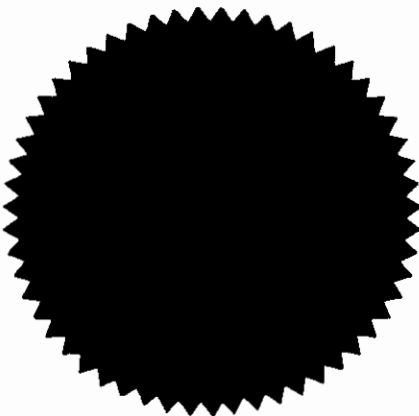


Certificate of Good Standing

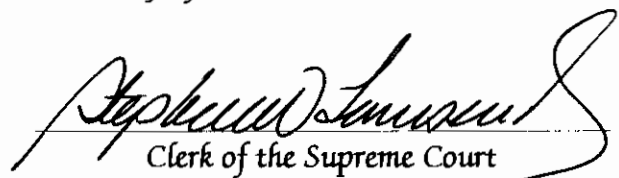
This is to certify that **DAVID M PELLETIER**
(No. **027502003**) was constituted and appointed an Attorney at Law of New
Jersey on **January 09, 2004** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
9TH day of October , 20 07


Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOEL S. ARIIO, in his official capacity as
Acting Insurance Commissioner of the
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Defendant.
-----X

Civil Action No.: 07-CV-7454 (LTS)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Kenneth R. Puhala, counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that

David M. Pelletier
Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
Telephone: 215-751-2000
Facsimile: 215-751-2205
dpelletier@schnader.com

is admitted to practice *pro hac vice* as counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of

attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
October ____, 2007

United States District Judge

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

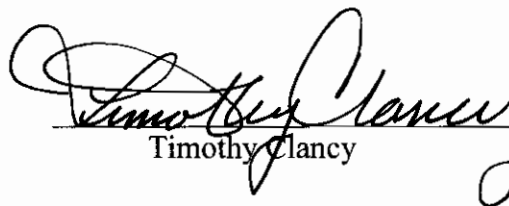
Timothy Clancy, being duly sworn, deposes and says, deponent is not a party to this action, is over eighteen (18) years of age and resides in Monmouth County, New Jersey.

On October 18, 2007, I served a true copy of the attached MOTION TO ADMIT COUNSEL PRO HAC VICE, with accompanying documents, upon:

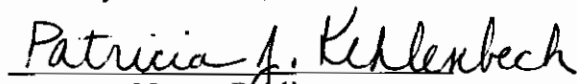
John A. Wait, Esq.
FOX ROTHSCHILD LLP
100 Park Avenue
Suite 1500
New York, New York 10017

Gerard E. Arth, Esq.
Cheryl A. Garber, Esq.
FOX ROTHSCHILD LLP
2000 Market Street, Tenth Floor
Philadelphia, Pennsylvania 19103

by First Class Mail.


Timothy Clancy

Sworn to before me this
18th day of October, 2007


Notary Public

PATRICIA J. KEHLENBECK
Notary Public, State of New York
No. 01KE6037739
Qualified in Nassau County
Commission Expires February 28, 20 10